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*Attorneys for Defendants Green United, LLC and Wright W. Thurston and Relief Defendants*

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH, CENTRAL DIVISION**

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SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

v.

GREEN UNITED, LLC, et al.,

Defendants.

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**DEFENDANTS' JOINT MOTION FOR  
AN EXTENSION TO FILE A  
RESPONSE TO THE SEC'S MOTION  
FOR LEAVE TO FILE AMENDED  
COMPLAINT**

Case No. 2:23-cv-00159-HCN-CMR

Judge Howard C. Nielson  
Magistrate Judge Cecilia M. Romero

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Pursuant to DUCivR 7-1(a)(2)(A), Defendant Green United, LLC, Defendant Wright W. Thurston, and the Relief Defendants True North United Investments, LLC and Block Brothers, LLC, with Defendant Kristoffer A. Krohn (collectively, the “Defendants”), through counsel of record, jointly request that they be granted an extension to respond to the Plaintiff Securities and Exchange Commission’s (“SEC”) Motion for Leave to File Amended Complaint [Dkt. 75] (the “Motion”). The SEC filed their Motion on January 24, 2024. The response to the Motion is due by February 7, 2024. The Defendants in this matter jointly request an extension to file a response to the SEC’s Motion by **Tuesday, February 13, 2024**, a 6-day extension. The

extension is necessary to assess the Motion and proposed Amended Complaint in light of the current posture of the case. Counsel for the Defendants have communicated this request with the SEC and the SEC has graciously stated that it does not oppose Defendants' joint request. A proposed Order allowing Defendants to file their response to the SEC's Motion by **Tuesday February 13, 2024**, is filed concurrently herewith.

DATED this 30th day of January 2024.

**PARSONS BEHLE AND LATIMER**

/s/ Jonathan D. Bletzacker  
Jonathan D. Bletzacker

*Attorneys for Defendants Green United, LLC,  
and Wright W. Thurston and Relief Defendants  
True North United Investment, LLC and Block  
Brothers, LLC*

DATED this 30th day of January 2024.

**FOLEY & LARDNER LLP**

/s/ Thomas J. Krysa  
Thomas J. Krysa  
(signed by filing attorney with permission)

*Attorneys for Defendant Kristoffer Krohn*

**CERTIFICATE OF SERVICE**

On this 30th day of January 2024, I hereby certify that I electronically filed a true and correct copy of the foregoing with the Clerk of the Court using the CM/ECF system, which sent notification and service to all counsel of record.

/s/ Jonathan D. Bletzacker